

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In re:

**VALINDA MARIE DODSON
DBA VALINDA M DODSON MORTGAGE
MARKETING,**

CHAPTER 13

DEBTOR.

CASE NO. 18-13714-KHK

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

NOTICE

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)

IF YOU DO NOT WISH THE COURT TO SUSTAIN THE OBJECTION SOUGHT HEREIN, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE OBJECTION, THEN YOU MUST ATTEND THE HEARING ON THIS MATTER. OTHERWISE, THE COURT MAY DEEM OPPOSITION WAIVED, TREAT THE OBJECTION AS CONCEDED, AND ISSUE AN ORDER SUSTAINING THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

THE HEARING IS SCHEDULED TO BE HELD ON JANUARY 17, 2019 AT 9:30 AM AT THE U.S. BANKRUPTCY COURT, JUDGE KINDRED'S COURTROOM, ALEXANDRIA DIVISION, 200 S. WASHINGTON STREET, ALEXANDRIA, VA 22314, IN COURTROOM NUMBER III, 3RD FLOOR.

COMES NOW, United Security Financial Corp. ("Secured Creditor"), by Counsel, and objects to the confirmation of the Chapter 13 Plan (the "Plan") and in support thereof, represents unto the Court:

1. Secured Creditor has a claim against the property of the Debtor located at **11549 Hearthstone Court, Reston, VA 20191** by virtue of the Note and accompanying Deed of Trust.
2. The pre-petition arrearage owed to Secured Creditor is approximately \$36,907.44. Secured Creditor is in the process of drafting and filing a Proof of Claim in the instant case.
3. The Plan is underfunded, as there is no provision for the pre-petition arrearage to be paid to Secured Creditor on the subject loan. The Plan also does not clearly indicate that regular monthly post-petition payments will be made to Secured Creditor as required.
4. Secured Creditor objects due to the aforesaid deficiencies in the Plan.
5. Any Chapter 13 Plan proposed by the Debtor must provide for and eliminate the objections specified above in order to be feasible and to provide adequate protection to this

Secured Creditor. It is respectfully requested that this Court deny confirmation of the Plan.

WHEREFORE, the undersigned requests as follows:

1. That confirmation of the proposed Plan be denied;
2. Debtor be required to modify the Plan to honor the terms and conditions of the

Deed of Trust; and

3. For such other relief as this Court deems proper.

United Security Financial Corp.

By: **/s/JOHNIE R. MUNCY**

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CERTIFICATE OF SERVICE

I certify that on November 20, 2018, the foregoing Objection was served via CM/ECF on Thomas P. Gorman, Trustee, at the email addresses registered with the Court, and that a true copy was mailed via first class mail, postage prepaid, to Valinda Marie Dodson, Debtor, 11549 Hearthstone Court, Reston, VA 20191.

/s/JOHNIE R. MUNCY

Johnie R. Muncy, Esquire
Samuel I. White, P. C.